



April 9, 2025

**MEMORANDUM TO
THE HONORABLE ALLYNE R. ROSS
United States District Judge**

Re: Feng Jiang
Docket No.: 1:24CR00264-01(ARR)

REQUEST FOR ADJOURNMENT OF SENTENCE DATE

The above-noted defendant is pending sentence before Your Honor, having pled guilty on January 10, 2025. At this time, the Probation Department is writing to request an adjournment of the sentence date, which is set for May 13, 2025, and would require disclosure of the presentence investigation report (PSR) no later than April 9, 2025. The Probation Department was recently made aware that this matter is related to a number of other matters. Therefore, the undersigned officer was recently assigned to complete the offense conduct for this defendant and is continuing to work with the Government to obtain all necessary information to complete the offense conduct. As such, the Probation Department is requesting an adjournment of the sentence date for at least 90 days to allow for the undersigned officer to obtain all the necessary information from the Government and afford sufficient time to prepare a thorough and accurate PSR.

Prepared by:

/s/ *Nicole Gervase*

Nicole Gervase
U.S. Probation Officer
347-534-3570

Approved by:

/s/ *Jaime L. Turton*

Jaime L. Turton
Supervisory U.S. Probation Officer
347-534-3685

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☒ An adjournment of the sentence date is acceptable. The new sentence date will be 6/24/25 @ 11⁰⁰am

☐ An adjournment of the sentence date is not acceptable.
/s/(ARR) *[Signature]*

The Honorable *Allyne R. Ross*
United States District Judge

cc: Patrick J. Campbell, Assistant United States Attorney | David S. Smith, Defense Counsel